

EXHIBIT G

COMMUNICATION WITH PRIOR COUNSEL



Sheridan Yeary <styear@yearylegal.com>

Re: Meeting Request

5 messages

Matthew J. Piers <MPiers@hsplegal.com>

Tue, Feb 11, 2025 at 10:26 AM

To: Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>

Cc: "styear@yearylegal.com" <styear@yearylegal.com>

I have been copied on minute orders and some of the pleadings and court orders, but otherwise have not followed this attempt to reopen Lewis after all these years.

Please provide me with a better idea of what it is you are looking for.

M

On Feb 11, 2025, at 9:00AM, Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com> wrote:

EXTERNAL EMAIL: Use caution when opening attachments, clicking links, or responding.

Hi Matthew,

I am Chiquita with NELA-Illinois. As you might be aware of, my office and Mr. Yeary's office picked up an old case of your firm's (the Lewis Class matter). We need to explore substitution of counsel or whatever is best for all involved.

I was hoping we could hope on a call by the end of this week.

Can you provide your availability for the week and your willingness to chat with us?

Zoom or telephone is just fine.

Best Regards,

Chiquita Hall-Jackson, Esq.

Hall-Jackson & Associates P.C.

[180 W. Washington St., Suite 820](#)

Chicago, IL 60602

Office: 312-255-7105

Fax: 312-690-4763

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Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>

Tue, Feb 11, 2025 at 12:45 PM

To: "Matthew J. Piers" <MPiers@hsplegal.com>
Cc: "styeary@yearylegal.com" <styeary@yearylegal.com>

Counsel,
We want to explore the idea of substitution of counsel or what it would look like to keep your firm on to bring a motion before the court.
Since we were not granted permission to be class counsel the Judge is asking that we handle that part first prior to filing another motion.
Again, let me know if you are willing to speak with Attorney Yeary and I this week. I am out of office next week and we want to get this part before the Judge as soon as possible. Please advise.

Best Regards,

Chiquita Hall-Jackson, Esq.
Hall-Jackson & Associates P.C.
180 W. Washington St., Suite 820
Chicago, IL 60602
Office: 312-255-7105
Fax: 312-690-4763

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From: Matthew J. Piers <MPiers@HSPLEGAL.COM>
Sent: Tuesday, February 11, 2025 9:26 AM
To: Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>
Cc: styeary@yearylegal.com <styeary@yearylegal.com>
Subject: Re: Meeting Request

[Quoted text hidden]

Matthew J. Piers <MPiers@hsplegal.com> Tue, Feb 11, 2025 at 3:34 PM
To: Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>
Cc: "styeary@yearylegal.com" <styeary@yearylegal.com>, Joshua Karsh <JKarsh@findjustice.com>

Ms Hall-Jackson;
I have discussed your request with my co-lead class plaintiffs' counsel from the Lewis case, Josh Karsh , copied here. From the facts alleged in the papers you've filed, we do not see any violation of the retroactivity seniority provision in the 2011 injunctive order of relief (provision B1 on op.4-5) because that provision does not provide class members with retroactive seniority for promotional purposes. Indeed, it provides for such relief for all purposes except promotions. Accordingly we respectfully decline your request to discuss your proposals.

Best
Matt Piers

[Quoted text hidden]

Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com> Tue, Feb 11, 2025 at 4:32 PM
To: "Matthew J. Piers" <MPiers@hsplegal.com>
Cc: "styeary@yearylegal.com" <styeary@yearylegal.com>, Joshua Karsh <JKarsh@findjustice.com>

The motion is not about the City not following the Order. We are all clear that the City is doing exactly as the attorneys on the matter intended it to do.

Our argument is stating that the Order is no longer equitable. While we can acknowledge that you would not like to join in the motion, my main concern is will you be willing to substitute counsel? I am simply asking for an affidavit to state that your office is not interested in representing the Lewis class and agree to withdraw your appearance on the file. It should take less than a hour of your time.

The Order put these individuals in a position to qualify for retirement before ever being promoted. That is not making them whole at all. So we are asking the court to modify the Order.

Josh, I know Bryan reached out to you recently but it appears he did not understand the request. Please read above and advise.

Best Regards,

Chiquita Hall-Jackson, Esq.
Hall-Jackson & Associates P.C.
180 W. Washington St., Suite 820
Chicago, IL 60602
Office: 312-255-7105
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From: Matthew J. Piers <MPiers@HSPLEGAL.COM>
Sent: Tuesday, February 11, 2025 2:34 PM
To: Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>
Cc: styeary@yearylegal.com <styeary@yearylegal.com>; Joshua Karsh <JKarsh@findjustice.com>
Subject: Re: Meeting Request

[Quoted text hidden]

Matthew J. Piers <MPiers@hsplegal.com> Tue, Feb 11, 2025 at 4:36 PM
To: Chiquita Hall-Jackson <chj@hall-jacksonandassociates.com>
Cc: "styeary@yearylegal.com" <styeary@yearylegal.com>, Joshua Karsh <JKarsh@findjustice.com>

Please see my prior response.
Absent direction from the court, we do not wish to comment further on your intended proceedings.

M

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